

**REMARKS**

Claims 1 – 10, 12 – 26 and 28 – 32 are pending in the present application. Claims 11 and 27 are canceled by the present amendment. Applicants are requesting reconsideration of the present application.

Applicants note with appreciation that the Examiner indicated that claims 5, 10, 21 and 26 would be allowable if rewritten in independent form. However, Applicants believe that all of the claims are now in condition for allowance, and as such, it does not appear that claims 5, 10, 21 and 26 need to be rewritten. Nevertheless, Applicants are amending claims 5, 10, 21 and 26 to delete recitals that do not appear to be necessary for patentability.

The Office Action Summary, item 10, indicates that the Examiner is objecting to the drawings. However, the Office Action does not further mention the drawings. On 20 JUN 2006, during an informal telephone conversation with Applicants, Examiner Suchin explained that the Office Action Summary was in error, and that there is no present objection to the drawings.

Applicants are amending the specification for consistency with the drawings, to provide support for the claims, and to correct typographical errors.

In section 1 of the Office Action, claim 24 is objected to because of an informality. Applicants amended claim 24 to address the informality. Withdrawal of the objection to claim 24 is respectfully solicited.

In section 3 of the Office Action, claims 11 and 27 are rejected. Applicants are canceling claims 11 and 27. Withdrawal of the rejection of claims 11 and 27 is respectfully requested.

In section 5 of the Office Action, claims 12 – 14 and 28 – 30 are rejected under 35 U.S.C. 112, first paragraph, as failing to comply with the enablement requirement, with regard to a recital of MTS(t) in claims 12 and 28. Applicants are amending claims 12 and 28, and amending paragraph 0058, to clarify the meaning of MTS(t). Applicants respectfully request reconsideration and withdrawal of the section 112 rejection of claims 12 – 14 and 28 – 30.

In section 6 of the Office Action, claims 4 and 20 are rejected under 35 U.S.C. 112, first paragraph, as failing to comply with the enablement requirement, with regard to a recital of a 5% accuracy. Applicants are amending paragraph 0067 to address this issue. Applicants respectfully request reconsideration and withdrawal of the section 112 rejection of claims 4 and 20.

In section 8 of the Office Action, claims 1, 2, 8, 9, 16 – 18, 24, 25 and 32 are rejected under 35 U.S.C. 102(b) as being anticipated by U.S. Patent No. 6,163,877 to Gupta (hereinafter "the Gupta patent"). of this set of rejected claims, two are independent, namely claims 1 and 17. Applicants are amending claims 1 and 17 to clarify an aspect of claims 1 and 17 that is not disclosed by the Gupta patent.

Claim 1 provides for an automated computer-implemented method. The method includes, *inter alia*, (a) applying a transformation to a pre-layout representation of a standard cell to obtain an estimated value of a parasitic of the standard cell, and (b) estimating a value for a characteristic of the standard cell, based on the estimated value of the parasitic.

The Gupta patent does not disclose (a) applying a transformation to a pre-layout representation of a standard cell to obtain an estimated value of a parasitic of the standard cell, and (b) estimating a value for a characteristic of the standard cell, based on the estimated value of the parasitic, as recited in claim 1. As such, the Gupta patent does not anticipate claim 1.

Claim 17 includes a recital similar to that of claim 1, as described above. Thus, the Gupta patent, for reasoning similar to that provided in support of claim 1, does not anticipate claim 17.

Claims 2, 8, 9 and 16 depend from claim 1, and claims 18, 24, 25 and 32 depend from claim 17. By virtue of these dependencies, claims 2, 8, 9, 16, 18, 24, 25 and 32 are also novel over the Gupta patent.

Applicants respectfully request reconsideration and withdrawal of the section 102(b) rejection of claims 1, 2, 8, 9, 16 – 18, 24, 25 and 32.

In section 15 of the Office Action, claims 3, 6, 7, 15, 19, 22, 23 and 31 are rejected under 35 U.S.C. 103(a) as being unpatentable over the Gupta patent in view of U.S. Patent No. 6,272,668 to Teene (hereinafter "the Teen patent").

Claims 3, 6, 7 and 15 depend from claim 1; and claims 19, 22, 23 and 31 depend from claim 17. As explained above, the Gupta patent does not disclose (a) applying a transformation to a pre-layout representation of a standard cell to obtain an estimated value of a parasitic of the standard cell, and (b) estimating a value for a characteristic of the standard cell, based on the estimated value of the parasitic, as recited in claims 1 and 17. Below, Applicants explain that the Teen patent does not make up for this deficiency of the Gupta patent.

The Teene patent in a passage at col. 10, lines 22 – 37 mentions timing/capacitance values, and more particularly, at col. 10, lines 26 – 29, explains that the timing/capacitance values are retrieved from files stored on a mass storage subsystem. Since, in the Teene patent, the timing/capacitance values are retrieved from files stored on a mass storage subsystem, there is no apparent need to apply a transform to obtain an estimated value of the capacitance, or to estimate a value for the timing based on the capacitance. Consequently, the Teen patent does not disclose or suggest (a) **applying a transformation to a pre-layout representation of a**

standard cell **to obtain an estimated value of a parasitic** of the standard cell, and (b) **estimating a value for a characteristic** of the standard cell, **based on the estimated value of the parasitic**, as recited in claims 1 and 17.

Thus, the Gupta patent and the Teene patent, whether considered independently or in combination with one another, neither disclose nor suggest (a) applying a transformation to a pre-layout representation of a standard cell to obtain an estimated value of a parasitic of the standard cell, and (b) estimating a value for a characteristic of the standard cell, based on the estimated value of the parasitic, as recited in claims 1 and 17. Accordingly, claims 1 and 17 are patentable over the cited combination of the Gupta and Teene patents.

Claims 3, 6, 7 and 15, by virtue of their dependence on claim 1, and claims 19, 22, 23 and 31, by virtue of their dependence on claim 17, are all patentable over the cited combination of the Gupta and Teene patents.

Applicants respectfully request reconsideration and withdrawal of the section 103(a) rejection of claims 3, 6, 7, 15, 19, 22, 23 and 31.

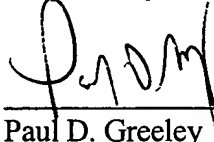
As mentioned above, Applicants are amending (a) claims 5, 10, 21 and 26 to delete recitals that do not appear to be necessary for patentability, (b) claim 24 to address an informality, (c) claims 12 and 28 to address a section 112 rejection, and (d) claims 1 and 17 to clarify an aspect of claims 1 and 17 that is not disclosed by the Gupta patent. Applicants are also amending various claims for one or more of (i) correcting an indefinite recital, (ii) ensuring an antecedent basis for terms, (iii) improving form, (iv) improving grammar, or (v) deleting recitals that do not appear to be necessary for patentability. None of the amendments is intended to narrow the scope of any term of any claim, and therefore, the doctrine of equivalents should be available for all of the terms of all of the claims.

In view of the foregoing, Applicants respectfully submit that all claims presented in this application patentably distinguish over the prior art. Accordingly, Applicants respectfully request favorable consideration and that this application be passed to allowance.

Date

8/9/06

Respectfully submitted,



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